

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

THE DEPARTMENT OF FAIR EMPLOYMENT)
AND HOUSING,)
Plaintiff,)
v.) No. CV 12-1830-EMC
LAW SCHOOL ADMISSION COUNCIL, INC.,)
Defendant.)

THE UNITED STATES OF AMERICA,
Plaintiff-Intervenor,
v.
) **JOINT MOTION FOR ENTRY
OF CONSENT DECREE,
INCLUDING PERMANENT
INJUNCTION¹**

LAW SCHOOL ADMISSION COUNCIL, INC.
Defendant.

ANDREW QUAN, NICHOLAS JONES, and
ELIZABETH HENNESSEY-SEVERSON,
Plaintiff-Intervenors,

LAW SCHOOL ADMISSION COUNCIL, INC.
Defendant.

¹ This Joint Motion for Entry of Consent Decree, Including Permanent Injunction, is submitted jointly by all the parties to this action. Pursuant to Civ. LR 3-4(a), a complete list of the parties is contained on the signature page of this document.

1 Plaintiff Department of Fair Employment and Housing, Plaintiff-Intervenor the United
2 States of America, Plaintiff-Intervenors Andrew Quan, Nicholas Jones, Elizabeth Hennessey-
3 Severson, and Defendant Law School Admission Council, Inc. (“LSAC”) (collectively “the
4 Parties”), have resolved all issues in this litigation by Consent Decree, attached as Exhibit A, and
5 memorialized by signatures at pages 41-44. In light of the agreement, the Parties respectfully
6 request consideration and approval of the attached Consent Decree, entry of the Proposed Order
7 and Permanent Injunction (included at the end of the Consent Decree at page 45), and upon
8 entry, dismissal of this case with prejudice. A proposed Order is attached.
9

10 DATED: May 20, 2014

Respectfully submitted,

11 **FOR THE CALIFORNIA
12 DEPARTMENT OF FAIR
13 EMPLOYMENT AND HOUSING:**

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**FOR THE UNITED STATES
7 OF AMERICA, CONTINUED:**

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² I, Melanie L. Proctor, hereby attest that I gained the concurrence of all signatories whose signatures are represented by /s/ in the filing of this document.

**[PROPOSED] ORDER GRANTING JOINT MOTION FOR ENTRY OF CONSENT
DECREE, INCLUDING PERMANENT INJUNCTION**

The Court has before it the Joint Motion for Entry of Consent Decree, Including Permanent Injunction. Upon consideration of the terms of the Consent Decree, and in light of the agreement of the parties, it is this ____ day of _____ 2014 hereby ORDERED that:

The Joint Motion for Entry of Consent Decree is GRANTED;

The clerk shall enter the Order and Permanent Injunction as a separate docket entry;

The clerk shall enter the signed Consent Decree as a separate docket entry;

The court shall retain jurisdiction over the Consent Decree; and

Accordingly, this case shall be dismissed with prejudice.

EDWARD M. CHEN
United States District Judge